

1 SHERI M. THOME, ESQ.
2 Nevada Bar No. 008657
3 WILSON, ELSER, MOSKOWITZ,
4 EDELMAN & DICKER LLP
5 6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
Telephone: (702) 727-1400
Facsimile: (702) 727-1401
sherithome@wilsonelser.com

6 CHARLES E. WEIR (CA Bar No.: 211091)
7 cweir@manatt.com (pro hac vice to be filed)
8 CODY A. DeCAMP* (CA State Bar No.: 311327)
9 cdecamp@manatt.com (pro hac vice to be filed)
10 MANATT, PHELPS & PHILLIPS, LLP
2049 Century Park East, Suite 1700
Los Angeles, CA 90067
Telephone: (310) 312-4000
Facsimile: (310) 312-4224

11 | *Attorneys for Defendant
VALLEY HEALTH SYSTEM, LLC*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

15 REGINA BAILEY, individually and on
16 behalf of a class of similarly situated
 individuals.

Plaintiff,
vs.

19 HCA, INC.; and VALLEY HEALTH
20 SYSTEM, LLC,

21 | Defendants.

Case No.: 2:21-cv-01740-RFB-BNW

**STIPULATION TO EXTEND THE
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S FIRST
AMENDED COMPLAINT**

(First Request)

Pursuant to Local Civil Rule 6-1(a), Defendant Valley Health System, LLC (“Defendant”) and Plaintiff Regina Bailey (“Plaintiff”) (collectively, the “Parties”) by and through their undersigned counsel, hereby stipulate and agree as follows:

25 WHEREAS, Plaintiff initiated this action by filing a complaint on September 21, 2021
26 against Defendant HCA, Inc.;

WHEREAS, Plaintiff filed a First Amended Complaint naming Valley Health System,

1 LLC as a Defendant on July 27, 2022;

2 WHEREAS, Plaintiff served Defendant with the summons and First Amended Complaint
3 on August 4, 2022;

4 WHEREAS, Defendant HCA, Inc. was voluntarily dismissed without prejudice from
5 these proceedings via a stipulation filed on August 11, 2022, which became the order of the Court
6 on August 12, 2022,

7 WHEREAS, pursuant to Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure,
8 Defendant's current deadline to respond to the First Amended Complaint is August 25, 2022;

9 WHEREAS, the Parties have agreed to extend the time for Defendant to respond to
10 Plaintiff's First Amended Complaint from August 25, 2022 to October 3, 2022;

11 WHEREAS, this stipulation and request is being entered into in good faith, and not for
12 reason of delay, as lead counsel for Defendant will be preparing for a trial that is scheduled to
13 proceed in September 2022;

14 WHEREAS, this is the first stipulation for an extension of time to respond to Plaintiff's
15 First Amended Complaint in this action;

16 WHEREAS, by entering into this Stipulation, the parties agree that Defendant has not
17 waived its right to bring any motion in response to Plaintiff's claims;

18 NOW, THEREFORE, the Parties, by their undersigned counsel, hereby stipulate to extend
19 Defendant's deadline to file its response to Plaintiff's First Amended Complaint from August 25,
20 2022 to October 3, 2022. Defendant shall have up to and including, October 3, 2022, to file a
21 response to Plaintiff's First Amended Complaint.

22 **IT IS SO STIPULATED.**

24 [SIGNATURES ON NEXT PAGE]

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1 Dated this 19th day of August, 2022

WILSON ELSER MOSKOWITZ EDELMAN
& DICKER LLP

2 By /s/ Sheri Thome

3 SHERI THOME, ESQ.
4 Nevada Bar No. 008657
6689 Las Vegas Blvd. S., Suite 200
Las Vegas, NV 89119

5 *Attorneys for Defendant*
6 VALLEY HEALTH SYSTEM, LLC.

7 Dated this 19th day of August, 2022

8 KAZEROUNI LAW GROUP, APC

9 By: /s/ Mona Amini

10 MONA AMINI, ESQ
11 Nevada Bar No. 15381
6069 South Fort Apache Road, Suite 100
Las Vegas, NV 89148

12 *Attorneys for Plaintiff*
13 REGINA BAILEY, individually
14 and on behalf of all others similarly situated

15 **ORDER**

16 GOOD CAUSE SHOWN, IT IS SO ORDERED.

17
18 
19 United States Magistrate Judge

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21 DATED: August 22, 2022